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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ROBERT GEOFFREY DAVIS,

Petitioner,

vs.

GABRIELA NAJERA, *et al.*,

Respondents

Case No.: 2:23-cv-01208-APG-MDC  
ORDER GRANTING  
**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO SECOND AMENDED  
PETITION (ECF NO. 22) (SECOND  
REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully move this Court for an enlargement of sixty-six (66) days of time, to and including August 8, 2025, in which to file and serve their answer to the second amended petition. ECF No. 22.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

This motion is made in good faith and not for the purpose of delay.

RESPECTFULLY SUBMITTED this 3rd day of June, 2025.

AARON D. FORD  
Attorney General

By: /s/ Leslie A. Healer  
LESLIE A. HEALER (Bar No. 16710)  
Deputy Attorney General

## **DECLARATION OF COUNSEL**

STATE OF NEVADA )  
CARSON CITY ) : ss.

I, LESLIE A. HEALER, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am a Deputy Attorney General of the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. My answer to the second amended petition (ECF No. 22) in this matter is currently due on June 3, 2025.

3. By this motion, I am requesting a sixty-six (66) day enlargement of time, to and including August 8, 2025, in which to file my answer. This is the second request for enlargement of time.

4. I require additional time to complete my answer in this matter.

5. I recently filed a reply in *Cepero v. Williams*, 2:24-cv-01823-APG-MDC, a reply in *Supranovich v. Hutchings*, 2:21-cv-01269-RFB-BNW, responses in *Devose v. Hutchings*, 2:21-cv-02069-APG-DJA, and in *Hartzell v. Breitenbach*, 3:24-cv-00028-ART-CLB. I also recently completed an oral argument in *Patterson v. Attorney General of the State of Nevada*, 23-3078 in the Ninth Circuit Court of Appeals. In addition, I have filed several responses in the state courts.

6. I have pending responses due in *Camacho v. Johnson*, 3-20-cv-004880-ART-CSD, *Cepero v. Williams*, 2:24-cv-01823-APG-MDC, and *Christman v. State of Nevada*, 2:23-cv-01695-GMN-NJK.

7. Additionally, I have been ill for over three weeks and also managing my child's illness, which included a visit to the emergency room. Therefore, I have been unable to complete the answer in this case.

8. Despite actively working on the answer in this matter, based on the number of claims and several extensions in other cases due to my illness, I need additional time to complete the pleading.

9. I contacted counsel for the petitioner, and Ron Sung indicated that he has no objection to this request.

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10. As such, this motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the foregoing is true and correct.

Dated this 3rd day of June, 2025.

By: /s/ Leslie A. Healer

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LESLIE A. HEALER (Bar No. 16710)

## ORDER

IT IS SO ORDERED.

Dated this 3rd day of June, 2025.

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ANDREW P. GORDON  
CHIEF UNITED STATES DISTRICT JUDGE